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Counsel for Onyx & Rose, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ONYX & ROSE, LLC,

Plaintiff,

v.

T1 Payments LLC,

Defendant.

Case No. 2:20-cv-00008-KJD-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS**

(First Request)

Plaintiff Onyx & Rose, LLC ("Onyx & Rose"), and Defendant T1 Payments LLC (T1 Payments")(collectively, the "Parties"), stipulate and agree as follows, under LR IA 6-1, LR IA 6-2, and LR 7-1:

1. On January 7, 2020, T1 Payments filed a Motion to Dismiss Count II of Plaintiff Onyx & Rose's Complaint, Or, in the Alternative, for Summary Judgment (the "Motion").

2. The Court Clerk has calendared the deadline for Onyx & Rose to respond to T1 Payments' Motion as January 21, 2020.

3. The Parties agree to extend the deadline for Onyx & Rose to respond to the Motion by fourteen (14) days to February 4, 2020.

4. Counsel for Onyx & Rose has requested additional time to analyze T1 Payments' Motion and prepare a response, in light of the fact that this case was recently transferred to this Court from the United States District Court for the Western District of Kentucky, *see* ECF Nos.

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12–14, and the undersigned counsel for Onyx & Rose were only retained on January 15, 2020, after Onyx & Rose’s diligent effort to retain competent Nevada counsel.

5. Counsel for Onyx & Rose has requested the extension to provide ample time to prepare a response to T1 Payments’ Motion that best promotes the just, speedy, and inexpensive determination of this action, and counsel for T1 Payments has agreed to the extension.

6. This is the first stipulation for an extension of time for Onyx & Rose to respond to T1 Payments’ Motion, and the Stipulation is not made for purposes of delay.

Dated: January 16, 2020

Dated: January 16, 2020

GREENBERG TRAURIG, LLP

LARSON ZIRZOW KAPLAN & COTTNER

/s/ Kyle A. Ewing
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Counsel for Onyx & Rose, LLC

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: 1/24/2020